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6 **IN THE UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF LAS VEGAS, NEVADA**

8 JOHN MCGRAW, ) CASE NO. 2:22-cv-01414-APG-NJK  
9 Plaintiff, )  
10 vs. )  
11 CHARLES KIM, individually; )  
12 LINDEN HOSPITALITY, LLC; FIRST )  
AMERICAN )  
13 TITLE INSURANCE COMPANY; )  
LHP RIVERHOUSE HOLDING, LLC; )  
14 DOES IX, and ROE CORPORATIONS )  
I-X, inclusive, )  
15 Defendants )  

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**STIPULATION AND ORDER EXTENDING  
TIME FOR PLAINTIFF TO FILE  
RESPONSE TO DEFENDANT FIRST  
AMERICAN TITLE INSURANCE  
COMPANY'S MOTION FOR AWARD OF  
ATTORNEY'S FEES AND COSTS OF  
LITIGATION AGAINST PLAINTIFF JOHN  
MCGRAW**

16 Plaintiff JOHN MCGRAW, Defendants CHARLES KIM, individually; LINDEN  
17 HOSPITALITY, LLC and FIRST AMERICAN TITLE INSURANCE COMPANY, by and through  
18 their undersigned counsel, hereby agree to extend the time for Plaintiff to file response to Defendant  
19 First American Title Insurance Company's motion for award of attorney's fees and costs of litigation  
20 against Plaintiff John McGraw up to and including February 21, 2025, as set out herein below.

22 Date: February 14, 2025

/s/ Paul W. Chandler

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**I.**  
**INTRODUCTION AND STATEMENT OF FACTS**

Defendant First American Title filed its Motion for Summary Judgment which was Granted on January 21, 2025. [ECF No. 96]. On February 4, 2025, First American Title filed a motion seeking an award of attorney's fees and costs of litigation. [ECF No. 111]. The parties are presently attempting to resolve these matters informally and have stipulated and agreed to extend the time for Plaintiff to file his response/opposition to the motion of First American Title until and including February 21, 2025.

This extension request is made in good faith, jointly by the parties, and not for the purposes of delay. Moreover, since this request is a joint request, no party will be prejudiced by granting the extension. The parties respectfully submit that the reasons set forth above constitute compelling reasons for the short extension. Nothing contained herein shall be deemed an admission or waiver of any right belonging to any party hereto.

WHEREFORE, the parties respectfully request that this Court extend the aforementioned period as requested.

## **IT IS SO STIPULATED:**

DATED this 14th day of February 2025

| /S/ *Tyler N. Ure*

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Tyler N. Ure, Esq.

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Attorneys for Defendants, CHARLES KIM

and LINDEN HOSPITALITY

1 DATED this 14th day of February 2025.

2

3 /S/ John M. Langeveld

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John M. Langeveld, Esq.

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Gerrard Cox Larsen

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Attorneys for First American Title Insurance Company

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DATED this 14th day of February 2025.

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/s/ Paul W. Chandler

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Paul W. Chandler, Esq.

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Attorneys for Plaintiff JOHN MCGRaw

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**IT IS SO ORDERED:**



17  
18 ANDREW P. GORDON  
19 CHIEF UNITED STATES DISTRICT JUDGE  
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DATED: February 18, 2025